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Attorneys for Defendants  
GREGORY D. LEWIS; J. HALLOCK; K. MCGUYER; MATTHEW CATE AND  
T.A. WOOD

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

RAYMOND J. MANZANILLO,

Plaintiff,

v.

GREGORY D. LEWIS, et al.,

Defendants.

Case No. 3:12-cv-05983-JST

**STIPULATION AND ~~PROPOSED~~ ORDER  
TO EXTEND DISCOVERY DEADLINES**

Plaintiff Raymond Manzanillo (“Plaintiff”) and Defendants N. Brown, Gregory D. Lewis, J. Hallock, K. McGuyer, Matthew Cate, and T.A. Wood (“Defendants”) (collectively “the Parties”) by and through their counsel hereby stipulate as follows:

1. The Parties anticipate that there will be a number of non-expert depositions in this matter.
2. To ensure that the Parties are able to complete all of the depositions and accommodate the schedules of the Parties and the witnesses, the Parties have agreed to extend all discovery deadlines by thirty (30) days (or the next court day assuming the new date falls on a weekend or holiday).
3. This stipulation will not impact the deadline to file dispositive motions; the deadline to file pretrial conference statements; the pretrial conference date; or the trial date.
4. Accordingly, the Parties stipulate that the amended case schedule shall be as follows:
  - a. Fact Discovery Cut-Off: April 4, 2016
  - b. Expert Disclosures: April 25, 2016
  - c. Expert Rebuttal: May 9, 2016
  - d. Expert Discovery Cut-Off: May 30, 2016
  - e. Deadline to File Dispositive Motions: June 17, 2016
  - f. Pretrial Conference Statement Due: September 13, 2016
  - g. Pretrial Conference: September 23, 2016 at 2:00 p.m.
  - h. Trial (estimated length six days) October 17, 2016 at 8:30 a.m.

IT IS SO STIPULATED.

DATED: December 16, 2015

Respectfully submitted,

SEYFARTH SHAW LLP

By: /s/ Michael A. Wahlander

Francis J. Ortman III  
Aryeh M. Hersher  
Jason M. Allen  
Michael A. Wahlander

Attorneys for Plaintiff  
RAYMOND J. MANZANILLO

1 DATED: December 16, 2015

Respectfully submitted,

2 MCNAMARA LAW FIRM

3  
4 By: /s/ William Lee McCaslin

5 Peter Jon Hirsig  
William Lee McCaslin

6 Attorneys for Defendant  
7 N. BROWN

8 DATED: December 16, 2015

Respectfully submitted,

9 CALIFORNIA STATE ATTORNEY  
10 GENERAL'S OFFICE

11 By: /s/ Michael James Quinn

12 Michael James Quinn

13 Attorneys for Defendants  
14 GREGORY D. LEWIS; J. HALLOCK;  
15 K. MCGUYER; MATTHEW CATE AND  
16 T.A. WOOD

17 **ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)**

18 I, Michael A. Wahlander, attest that concurrence in the filing of this stipulation has been  
19 obtained from the signatories, William Lee McCaslin and Michael James Quinn, counsel for  
20 Defendants.

21 Executed this 16th day of December 2015, in San Francisco, CA.

22 /s/ Michael A. Wahlander

23 Michael A. Wahlander

**~~PROPOSED~~ ORDER**

Pursuant to the Parties' stipulation and good cause appearing, the Scheduling Order [ECF No. 168] is amended to reflect the dates set forth in the Parties' stipulation.

IT IS SO ORDERED.

Dated: December 16, 2015

